

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on Sunday  
and Holiday Collections

Docket No. C2001-1

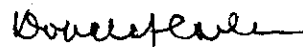
DOUGLAS F. CARLSON  
FOLLOW-UP INTERROGATORIES  
TO THE UNITED STATES POSTAL SERVICE  
(DFC/USPS-60-69)

July 14, 2001

Pursuant to POR C2001-1/1 and sections 25-27 of the *Rules of Practice*, I hereby submit these follow-up interrogatories to the United States Postal Service. I received the initial responses on July 9, 2001.

Respectfully submitted,

Dated: July 14, 2001



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DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.



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DOUGLAS F. CARLSON

July 14, 2001  
San Luis, Arizona

**DFC/USPS-60.** Please refer to the response to DFC/USPS-52 and USPS-LR-4. The library reference includes e-mail messages indicating, for example, that "Becky Dobbins needs a release showing that we publicized the Saturday Collection Schedule" for July 3, 2000. These e-mail messages are generally dated in July 2000.

- a. Please explain why Postal Service headquarters specifically requested copies of these press releases after July 3, 2000.
- b. Please explain whether the request described in these e-mail messages represents a standard practice after the eve of a holiday on which Postal Service headquarters has authorized deviations from the collection schedules that normally apply for day of the week that corresponds to the eve of the holiday.

**DFC/USPS-61.** Please refer to the response to DFC/USPS-51(b), which asserts that the P&DC in Portland, Oregon, did not cancel outgoing mail on Memorial Day in 1999.

- a. Please confirm that the postal holiday for Memorial Day in 1999 occurred on Monday, May 31, 1999.
- b. Please refer to Attachment 1 to DFC/USPS-61, which shows a photocopy of a stamped card that has a postmark from Portland, Oregon, dated May 31, 1999. Please reconcile the response to DFC/USPS-51(b) with Attachment 1 to DFC/USPS-61. If you cannot reconcile the response with this attachment, please confirm that the P&DC in Portland, Oregon, cancelled and processed outgoing mail on Memorial Day in 1999. (If necessary, upon request I will make the original stamped card available to the Postal Service for inspection.)

**DFC/USPS-62.** Please refer to the responses to DFC/USPS-14 and DFC/USPS-34.

- a. Does the "suspension of collections" on Christmas Eve in 1996 in Phoenix, Tucson, and Salt Lake City mean that some boxes in those

areas were not collected at all on Christmas Eve in 1996? If not, please explain the meaning of "suspension of collections."

- b. Please confirm that the practice of performing early collections on Christmas Eve in 1992 and 1993, when Christmas Eve fell on a Thursday and Friday, respectively, was less frequent in 1992 and 1993 than it was in 1998 and 1999.

**DFC/USPS-63.** Please refer to the response to DFC/USPS-35(c). For districts other than New York, please explain why "there would be no practical efficiencies to be gained" by dropping early collections from collection boxes but retaining at least the final collection posted on each collection box.

**DFC/USPS-64.** Please refer to the response to DFC/USPS-42.

- a. Suppose that an EXFC test bundle is deposited in a collection box. Suppose, further, that none of the pieces in that bundle meets its service standard. Suppose, further, that each piece *is* postmarked on the day on which one would have expected each piece to be postmarked based on the date and time of deposit and the posted collection times on the collection box. Is this test bundle considered a zero bundle? If not, please explain why not.
- b. Suppose that an EXFC test bundle is deposited in a collection box. Suppose, further, that each piece is postmarked one day or more later than the date on which one would have expected each piece to be postmarked based on the date and time of deposit and the posted collection times on the collection box. Suppose, further, that at least one piece is delivered such that the piece meets the applicable First-Class Mail delivery standard. Is this test bundle considered a zero bundle? If yes, please explain.

**DFC/USPS-65.** Please refer to the response to DFC/USPS-42(b). Please explain how and why zero bundles "are indicative of poor service quality."

**DFC/USPS-66.** Please refer to the response to DFC/USPS-42(d). All else equal (including volume), please confirm that a zero bundle caused by a missed collection prior to a holiday may have an effect on service quality that is worse than the effect on service quality of a zero bundle caused by a missed collection on a day that does not directly precede a holiday because the mail may not be collected for one or more days beyond the originally scheduled collection date due to the holiday (and possibly an intervening Sunday).

**DFC/USPS-67.** Please refer to the response to DFC/USPS-45. Please confirm that collection boxes located in front of some postal facilities, including stations that do not also function as carrier delivery units, are assigned to a street collection route that operates out of another facility; therefore, those collection boxes are not collected by “a returning carrier.” If you do not confirm, please explain.

**DFC/USPS-68.** Please refer to the response to DFC/USPS-46, which states that communications to the public in the Pacific Area “probably do not provide much information specifically about collection plans[.]” Please refer, also, to page 9 of the “Response of the United States Postal Service to Order No. 1307, and Motion for Reconsideration” (filed April 10, 2001), which states, “The matter of potential deception of the public regarding the services to be provided on specific holidays, while perhaps theoretically of interest, is not likely to be a substantial issue. Most mailers probably rely on three sources of information. One source is newspapers and other local media, which might include information on postal services within a broader summary of holiday shutdowns and the like. \* \* \*” Please confirm that media releases in the Pacific Area typically do not provide information describing collection plans for holidays on which the Postal Service plans to collect and process outgoing mail. If you do not confirm, please provide copies of the media releases that announce the collection plans.

**DFC/USPS-69.** Please refer to the response to DFC/USPS-48. For each year from 1980 to 2001 for which data are available, please provide national EXFC and ODIS data that show the average number of days to delivery for First-Class Mail.

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